## IN THE UNITED STATES DISTRICT COURT

## FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**DOUGLAS EL CIVIL ACTION** 

Plaintiff

No. 02CV3591 v.

SOUTHEASTERN PENNSYLVANIA JURY TRIAL DEMAND

TRANSPORTATION AUTHORITY

Defendant.

## **DEFENDANT'S EMERGENCY MOTION FOR SANCTIONS**

Southeastern Transportation Authority ("SEPTA"), moves this Court for an Order sanctioning Plaintiff for refusing to comply with an Order of this Court and his discovery obligations for the reasons more fully set forth in its accompanying memorandum of law.

Respectfully submitted,

Robert J. Haurin SAUL H. KRENZEL & ASSOCIATES Attorneys for SEPTA The Robinson Building 42 South 15th Street, Suite 800 Philadelphia, PA 19102 (215) 977-7230

Dated: August 27, 2004